

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

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**BARBARA PIPER, as Executrix of the Estate  
of Michael Piper, Deceased, on behalf of  
herself and all others similarly situated,**

*Plaintiff,*

**v.**

**BAYER CROPSCIENCE LP, BAYER  
CROPSCIENCE INC., CORTEVA INC.,  
CARGILL INCORPORATED, BASF  
CORPORATION, SYNGENTA  
CORPORATION, WINFIELD SOLUTIONS,  
LLC, UNIVAR SOLUTIONS, INC.,  
FEDERATED CO-OPERATIVES LTD.,  
CHS INC., NUTRIEN AG SOLUTIONS  
INC., GROWMARK, INC., GROWMARK  
FS, LLC, SIMPLOT AB RETAIL SUB, INC.,  
AND TENKOZ INC.,**

*Defendants.*

Case No. 3:21-CV-00021-NJR

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**JOHN C. SWANSON, individually and on  
behalf of all others similarly situated,**

*Plaintiff,*

**v.**

**BAYER CROPSCIENCE LP, BAYER  
CROPSCIENCE INC., CORTEVA INC.,  
CARGILL INCORPORATED, BASF  
CORPORATION, SYNGENTA  
CORPORATION, WINFIELD SOLUTIONS,  
LLC, UNIVAR SOLUTIONS, INC.,  
FEDERATED CO-OPERATIVES LTD.,  
CHS INC., NUTRIEN AG SOLUTIONS  
INC., GROWMARK, INC., GROWMARK  
FS, LLC, SIMPLOT AB RETAIL SUB, INC.,  
AND TENKOZ INC.,**

*Defendants.*

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Case No. 3:21-CV-00046-NJR

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**CHARLES LEX,**

*Plaintiff,*

**v.**

Case No. 3:21-CV-00122-NJR

**BAYER CROPSCIENCE LP, BAYER CROPSCIENCE INC., CORTEVA INC., CARGILL INCORPORATED, BASF CORPORATION, SYNGENTA CORPORATION, WINFIELD SOLUTIONS, LLC, UNIVAR SOLUTIONS, INC., FEDERATED CO-OPERATIVES LTD., CHS INC., NUTRIEN AG SOLUTIONS INC., GROWMARK, INC., GROWMARK FS, LLC, SIMPLOT AB RETAIL SUB, INC., AND TENKOZ INC.,**

*Defendants.*

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**JONES PLANTING CO. III, on behalf of  
itself and all others similarly situated,**

*Plaintiff,*

**v.**

Case No. 3:21-CV-00173-NJR

**BAYER CROPSCIENCE LP, BAYER CROPSCIENCE INC., CORTEVA INC., CARGILL INCORPORATED, BASF CORPORATION, SYNGENTA CORPORATION, WINFIELD SOLUTIONS, LLC, UNIVAR SOLUTIONS, INC., FEDERATED CO-OPERATIVES LTD., CHS INC., NUTRIEN AG SOLUTIONS INC., GROWMARK, INC., GROWMARK FS, LLC, SIMPLOT AB RETAIL SUB, INC., AND TENKOZ INC.,**

*Defendants.*

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**JASON J. CANJAR D/B/A YEDINAK  
REGISTERED HOLSTEINS, on behalf of  
himself and all others similarly situated,**

*Plaintiff,*

Case No. 3:21-CV-00181-NJR

**v.**

**BAYER CROPSCIENCE LP, BAYER  
CROPSCIENCE INC., CORTEVA INC.,  
CARGILL INCORPORATED, BASF  
CORPORATION, SYNGENTA  
CORPORATION, WINFIELD SOLUTIONS,  
LLC, UNIVAR SOLUTIONS, INC.,  
FEDERATED CO-OPERATIVES LTD.,  
CHS INC., NUTRIEN AG SOLUTIONS  
INC., GROWMARK, INC., GROWMARK  
FS, LLC, SIMPLOT AB RETAIL SUB, INC.,  
AND TENKOZ INC.,**

*Defendants.*

**SYNGENTA CORPORATION'S MOTION TO DISMISS THE CLASS ACTION  
CONSOLIDATED COMPLAINT**

Syngenta Corporation hereby moves to dismiss with prejudice all claims against it in this action pursuant to Fed. R. Civ. P. 12(b)(6), on the grounds set forth in Defendants' Joint Motion to Dismiss Plaintiffs' Class Action Consolidated Complaint and the Memorandum of Law in Support Thereof, and in addition thereto because plaintiffs fail to state a claim for conspiracy as to Syngenta Corporation, as set forth in Syngenta Corporation's Memorandum of Law in Support of Its Motion to Dismiss the Class Action Consolidated Complaint.

Dated: May 5, 2021

/s/ Paul S. Mishkin

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*Attorneys for Syngenta Corporation*

**CERTIFICATE OF SERVICE**

I, Paul S. Mishkin, an attorney, hereby certify that I filed Syngenta's Motion to Dismiss the Class Action Consolidated Complaint using the CM/ECF system on this 5th day of May 2021. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Paul S. Mishkin